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Attorneys for Plaintiffs and the Putative Class

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA

TERRY SAIDEL and CAMILLE JACKSON,
 individually and on behalf of all others similarly
 situated,

Plaintiffs,

vs.

CBS RADIO, INC., a Delaware corporation and
 DOES 1 through 10, inclusive,

Defendants.

) Case No.: CV 07-02948-SC
)
) CLASS ACTION
)
) **NOTICE OF MOTION AND MOTION FOR**
) **PRELIMINARY APPROVAL OF**
) **PROPOSED SETTLEMENT,**
) **CONDITIONAL CLASS CERTIFICATION,**
) **APPROVAL OF CLASS NOTICE, AND**
) **SETTING OF FINAL APPROVAL**
) **HEARING**
)
) Date: August 15, 2008
) Time: 10:00 a.m.
) Courtroom: One
) Hon. Samuel L. Conti
) Complaint Filed: May 3, 2007
) Trial Date: None set

TO: ALL INTERESTED PARTIES AND TO THEIR ATTORNEYS OF RECORD:

NOTICE IS HEREBY GIVEN that on August 15, 2008 at 10:00 a.m. before Honorable Samuel Conti, District Court Judge, in Courtroom 1 of the above-entitled Court, located at 450 Golden Gate Avenue, 17th Floor, San Francisco, California 94102, Plaintiffs Terry Saidel and Camille Jackson, individually on behalf of themselves, and all others similarly situated, will move this Court for an Order for the following:

1. Granting Preliminary Approval of the Class Action Settlement as set forth more particularly in the "Joint Stipulation of Class Action Settlement and Release" ("Settlement Agreement") attached as Exhibit "1" to the Declaration of Michael D. Singer filed and served concurrently with this motion;

2. Approving the Notice of Class Action Settlement to be mailed to the Settlement Class, which sets forth a schedule and procedure for the filing of claim forms to participate in the settlement, requests for exclusion, and objections to the settlement. The Notice of Class Action Settlement and Claim Form are attached to the above-referenced Settlement Agreement;

3. Conditionally certifying the above-captioned case as a class action for settlement purposes only; and

4. Setting a Fairness Hearing to consider Final Approval of the Settlement.

This motion is made on the grounds that the Parties have reached a proposed settlement which they believe to be fair, reasonable and adequate and in the best interests of the class and all Parties. The proposed settlement provides a complete plan for notifying the class of the proposed settlement herein, timing of class member objections, requests for exclusion, submission of claim forms, class member challenges, and distribution of individual settlement payments upon this Court's Final Approval.

This Motion is based on this Notice of Motion, the Memorandum of Points and Authorities in Support thereof, Declaration of Michael D. Singer, the Settlement Agreement and its exhibits, and the [Proposed] Order Granting Preliminary Approval of the Class Action Settlement filed and served

herewith, and any other documents or evidence which the Court may consider at the hearing of this motion.

Dated: July 11, 2008

Respectfully submitted,

/s/ Diana M. Khoury

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